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FOOD MAIL ROOM

January 16, 1995

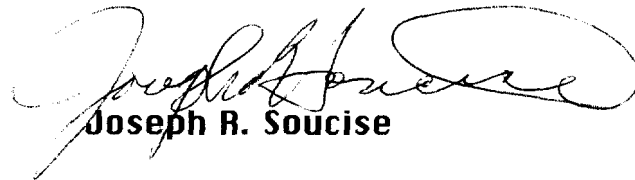
To: F.C.C.

Re: Written Comments on Unattended Operations

DOCKET FILE COPY ORIGINAL

To whom it may concern:

Please let it be understood that the written comments, dated January 16, 1995 are solely those of Joseph R. Soucise and do not represent or imply the position of any other person or organization.

  
Joseph R. Soucise

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**Technical and Operational Services for Broadcasters**

*\*Holder of Lifetime F.C.C. General Class License\**

*\*Certified at the Senior Radio level by the Society of Broadcast Engineers \**

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Secretary  
Federal Communications Commission  
1919 M St. N.W.,  
Washington, D.C. 20554

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Dear Sir or Madam:

This letter is written in response to the request for comments regarding operating a radio station unattended. I appreciate the opportunity to express my opinion on this matter.

I have been in commercial radio broadcasting for nearly 20 years. I have never in the past written in response to a "Notice of Inquiry". This time though, I felt my convictions and experience required me to comment. Over those 20 years I have served as an announcer, an account executive and for the last 14 years I've been in radio engineering. I have worked in every size market including top 10. Today I am employed as a radio station Engineering Manager in Boston, Massachusetts.

It was inevitable that as technology has advanced since the beginning of radio that operating a radio station unattended would arrive. I am not categorically opposed to the idea. In fact it may be another giant step in the right direction if it is implemented correctly. There are many radio stations presently On-the-Air that have "pushed the envelope" to its maximum and for all intents and purposes operate today...unattended. The problem arises when we make the assumption that all radio stations are of equal technical quality. From my own personal experience consulting for radio stations you will still find transmitting equipment on the air every day that is 30, even 40 years old, but designed with even older technology of the 1940's or earlier. Is this the "dependable modern tube technology" we are considering. I think not.

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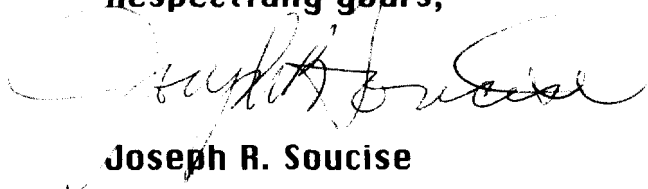
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If the rules for station operation change and a radio station can operate unattended, then I would advise that a set of clearly defined guidelines needs to be proposed for station implementation. If they are not then the potential for harmful interference and operating beyond station authorization is a real concern. Even now with some stations operating with personnel this exists, so an automatic system could improve compliance in some instances. One of my biggest concerns though is who installs and certifies the automatic transmission system (ATS)? How do you know it's operating correctly. Do you check it when it's installed and then forget about it? If a radio station is going to benefit from the economic advantages of walkaway operations then they should be responsible for some means of regular monitoring of that system. Whether this be daily, weekly, monthly, quarterly...etc. at least then the potential for continued interference wouldn't or shouldn't be indefinite. If ATS inspection isn't required, how can you know it's operating correctly or even at all? I know that in some ways this defeats the intent of the proposal, but if the industry is allowed to govern itself with this matter I'm not convinced that "everyone is a responsible licensee".

In closing I believe this is another normal and timely evolution for the radio industry, in fact maybe all broadcast services, but only if it is carefully considered. I do have other thoughts on the subject but I have included here only my areas of greatest concern. If you would like any further input about this subject from me, I would consider it an honor to respond. I can be reached at the address above or at my place of employment daily. I have enclosed my business card for that purpose.

Respectfully yours,



Joseph R. Soucise

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